# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In re Applications of	)	MM Docket No. 97-79
	)	
PATAPHYSICAL BROADCASTING	)	File No. BPED-940316MB
FOUNDATION	)	
San Ardo, California	)	
Req. 91.7 MHZ, Channel 219B	)	
2.7kW(V); 543 meters	)	
• •	)	
CENTRAL COAST EDUCATIONAL	)	File No. BPED-950606MB
BROADCASTERS	)	
King City, California	)	
Req: 91.3 MHZ, Channel 217A	)	
0.900 kW(V); -117 meters	)	
	,	

To: Administrative Law Judge

John M. Frysiak

#### PETITION FOR LEAVE TO AMEND

Central Coast Educational Broadcasters ("Central") is one of two parties to the above-captioned comparative hearing which involves the establishment of new noncommercial, educational FM radio service ("NCE-FM") in the King City/San Ardo, California area. For the following reasons, Central petitions for leave to amend its application for King City, California.<sup>1</sup>

#### **Introduction**

The parties to this hearing have executed a Settlement Agreement which is being filed as part of a joint petition for settlement. Under the terms of the agreement, the applications for Pataphysical Broadcasting Foundation ("Pataphysical) for channel 219 B would be granted as filed, and Central would amend its application by moving its transmitter location to an area with little population would effectively eliminate the harmful interference to the reception of Pataphysical's signal.

<sup>&</sup>lt;sup>1</sup> Attachment 1 hereto is Central's amended FCC Form 340 application.

#### Good Cause Exists for Grant of the Amendments Proposed by Central.

The standard for the acceptability of the amendments proposed herein by Central is "good cause". 47 C.F.R. §73.3522(b). This gauge is satisfied. Grant of the amendments will permit the prompt authorization of two new NCE-FM services in San Ardo and King City and will avoid the expense and delay of a comparative hearing. The new service gains will be accomplished without any loss of existing service.

Grant of Central's amendment involves a waiver of Section 73.509(a) of the Commission's rules, 47 C.F.R. §73.509(a) because there will be prohibited overlap between the 80 dBu contour of Central's amended Channel 217A application and the 60 dBu contour of Pataphysical's Channel 219B application. This area of represents 0.54 % of Pataphysical's 60 dBu contour, a *de minimis* overlap. In order to resolve this proceeding, the parties agree to accept this small degree of received interference.

Part of the settlement package being filed herewith includes a petition for waiver of Section 73.509(a) of the Commission's rules. The public interest factors in support of the waiver request also support grant of Central's petition for leave to amend. Another comparative proceeding involved facts and policy determinations analogous to this proceeding. *In re Applications of Cabrini College, et al.*, MM Docket 89-309 (ALJ, August 7, 1989). The *Cabrini College* case involved, and approved, the same type of "donut interference" as encountered between Central's application and Pataphysical's application.

<sup>&</sup>lt;sup>2</sup> Donut interference refers to a situation where the transmitter site for one station is encompassed by the 60 dBu contour of another station.

#### Conclusion

Approval of the amendment proffered by Central for its application in King City, California is an essential element of the hearing settlement proposed herein. Therefore, Central respectfully requests that the presiding Judge grant its Petition for Leave to Amend and the attached amendment.

Respectfully submitted,

Central Coast Educational Broadcasters

By Tan S. Bull

Its Attorney

Irwin, Campbell & Tannenwald, P.C. 1730 Rhode Island Avenue, N.W., Suite 200 Washington, D.C. 10036-3101 (202) 728-0400 July 16, 1997

# **AMENDMENT**

Please amend the application of Central Coast Educational Broadcasters, for a new FM station at King City, CA, (BPED-940606MB) with the attached engineering material.

Signed and dated this /Oth day

of July, 1997.

Central Coast Educational Broadcasters

Carl J. Auel, Trustee

			FC	DR COMMISSION	ON USE ON	_Y		•	
<b>S</b> A:	V-B - FM BROADCAS	T ENGINEEDING DA		File No.					
Section	A-B - LW DUCKDCK2	) ENGINCERING DA	' A	SB Referral D	310			_	
<u></u>			R(	eferred by					
Name of Applic									
Cent	tral Coast Education	onal Broadcasters							
Call letters (if	issuedi	Is this applica	tion being file	d in response	to a windo	iw?	Yes	No	
N/	'A	If Yes, specif	y closing date:	: <u>N/</u>	<u>A</u>				
Purpose of App	plication: leheck appropri	ete bealesil Amend p	ending app	lication					
Constru	uct a new (main) facility		Constru	uct a new aux	kiliary facility	,			
Modify	existing construction per	rmit for main facility	Modify	existing cons	struction per	mit for a	auxiliary fa	citity	
Modify	licensed main facility		Modify	licensed aux	iliary facility				
If purpose is to	o modify, indicate below	the nature of change(s) a	and specify the	file number(s	s) of the au	thorization	ns affecte	d.	
Antenn	a supporting-structure he	ight	Effecti	ive radiated po	ower				
Antenn	a height above average to	errain .	Freque	ncy					
Antenn	a location		Class						
Main S	itudio location	•	Other	(Summerize br	i <b>efly</b> l				
File Number	(s) BPED-940606ME	3						-	
1. Allocation:					<del>,</del>				
Channel No.	Princ	cipal community to be se	erved:		Class lei	heck enly	ene bez bi	100/	
	City	County		State	A	□ 81	В	□ C3	
217	King City	Montere	У	CA	C2	□ c1	c		
2. Exact location	on of anteons								
	ddress, city, county and s	state. If no address, spec	ify distance an	nd bearing ret	Itive to the	nearest t	own or la	ndmark.	
1.05 kn	n NW of Bitterwater i	Road. 8.0 km NE of o	enter of Kir	na Citv. Mo	nterev Co	untv. C	A		
Otherwise	ical coordinates (to neare: e, specify tower location. ngitude will be presumed.	Specify South Latitude	_						
Latitude	36 ° 16	18	Longitude	121 '	)	05	11	7	
3. Is the suppo	rting structure the same	as that of another station	(s) or propose	ed in another	pending	[	Yes	No	
If Yes, gwe	call letter(s) or file numb	er(s) or both.	N/A						
	involves a change in heigh purtenances, and lighting,		e, specify exit	sting height al	pove ground	level inc	:luding ante	enna,	
			13//4						

Latitude	N/A ° '		Longitude	N/A °	<del></del>	· · · · · · · · · · · · · · · · · · ·	
lf Yes, determ	FAA been notified of the proposi- give date and office where notice ination, if available.	was filed and attac				Exchib	res No.
Date	June 1997 of	fice where filed V	vestern-Pac	ific Regional	Office		
List all	tanding areas within 8 km of anter.	na site. Specify dist	ance and beari	ng from structur	e to near	est point of	the nearest
	Landing Area	Dis	itance (km)		Beari	ng (degrees 1	[rue)
(a)	Mesa Del Rey		5.8			216	
(b) _							
(a) Elevi	ation: Ite the mearest meteri						
(1)	of site above mean sea level;				_	250	meters
(2)	of the top of supporting structure appurtenances, and lighting, if any);	•	iding antenna, a	III other	-	24	meters
(3)	of the top of supporting structure	above mean sea le	vel [(a)(1) +	(a)(2) ]	_	274	meters
(b) Hei	ght of radiation center: Ite the ne	erest meteri. H = h	lorizontal; V =	Vertical			
(1)	above ground				_	N/A	meters (
					_	22	_ meters (
(2)	above mean sea level [(a)(1) 4	· (b)(1) }			_	N/A	meters (
					_	272	_ meters (
(3)	above average terrain				-	N/A	meters (
					-	11	meters (
in Que:	as an Exhibit sketch(es) of the supstion 7 above, except item 7(bX3), heights and orientations of all arri	If mounted on an a	NM directional-	array element,		Exhit	ok No. E1
Effectiv	e Radiated Power;						
(a) ERP	in the horizontal plane		_	N/A I	(w (H#) _	.930	_ kw (V#)
(b) is b	earn tilt proposed?						/es <b>II</b> N
	es, specify maximum ERP in the participation of the	ane of the titled be	am, and attach		vertical	Exhib N/	A No.

#### SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 3)

10. Is a directional antenna proposed?				Y
If Yes, attach as an Exhibit a statemer plot(s) and tabulations of horizontally if field.	·			Exhibit No. E2
11, Will the main studio be located within	the 70 dBu or 3.16 mV/	m contour?		Yes 🗌
If No, attach as an Exhibit justification	pursuant to 47 C.F.R. Sei	otion 73.1125.		Exhibit No. N/A
12. Are there: (a) within 60 meters of transmitters, or any nonbroadcast lead blanketing contour, any established of facilities, or populated areas; or (c) wor authorized FM or TV transmitters with the state of th	ept citizens band er am commercial or governme thin ten (10) kilometers	eteer! radio stations; on receiving stations, of the proposed antenr	r (b) within the cable head-end	Yes .
If Yes, attach as an Exhibit a description steps to be pursued if necessary, and objectionable interference (including the facilities in existence or authorized or 47 C.F.R. Sections 73.315161, 73.31614)	a statement accepting full at caused by receiver-in to radio receivers in usi	responsibility for the educed or other types of	limination of any of modulation) to	Exhibit No. E3
13. Attach as an Exhibit a 7.5 minute seriolearly, legibly, and accurately, the loca with the requirements set forth in Instructional display the original printed contour line bear a scale of distance in kilometers.	tion of the proposed tra- uction D for Section V.	nsmitting antenna. This n Further, the map must o	nap must comply learly and legibly	Exhibit No.
14. Attach as an Exhibit (name the source) original printed latitude and longitude m Map is Monterey 1:250,000 sca (a) the proposed transmitter location, as	arkings and a scale of dis le topographic map	stance in kilometers:		Exhibit No. E5
(b) the 1 mV/m predicted contour commercial channel, the 3.16 mV/m co		educational applicants	applying on a	
(c) the legal boundaries of the principal	community to be served			
15. Specify area in square kilometers (1 : predicted 1 mV/m contour,	iq. mi, = 2.59 sq, km.)	and population (latest co	ensus) within the	
Area sq. kr	n, Population	8,611		
16. Attach as an Exhibit a map (Sectional posed 1 mV/m (60 dbu) contours.	Aerenautical charts shere	ebteineble/showing the	present and pro-	Exhibit No.
Enter the following from Exhibit above	: Gain Area Loss Area	38.6 4.6	_ sq. mi. _ sq. mi.	
Percent change (gain area plus loss are If 50% or more this constitutes a ma			%. cordingly.	

Exhibit No. N/A

Allocation Studies

15ee Subject E of 47 E.F.P. Part 731

.375

.055

15.6

7.7

19.	IS	the	proposed	<b>S</b> utenus	location	within	320	kilometers	(199	miles)	of	the	common	border	Detween
	the	Uni	ted States	and Me	xico?										

119.0

76.8

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.

	No.
N/A	4

270

315

20. Is the proposed antenna location within 320 kilometers of the common border between the United States and Canada?	Yes No
If Yes, attach as an Exhibit a showing of compliance with all provisions of the Working Agreement for Allocation of FM Broadcasting Stations on Channels 201–300 under The Canada-United States FM Agreement of 1947.	nibit No. N/A
21. If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as an Exhibit a complete allocation study to establish the lack of prohibited overlap of contours with other U.S. stations. The allocation study should include the following:	chibit No. E7
(a) The normally protected interference-free and the interfering contours for the proposed operation	
along all azimuths.  (b) Complete normally protected interference—free contours of all other proposals and existing stations to which objectionable interference would be caused.	
(c) interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.	
(d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing	
stations, which require study to show the absence of objectionable interference.  (e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call	
fetters, file numbers and operating or proposed facilities.  (f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.	
(g) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire Exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.  (h) The name of the map(s) used in the Exhibit(s).	
22. With regard to any stations separated by 53 or 54 channels (10.6 or 10.8 MHz) attach as an Exhibit information required in 1/ Isoperation requirements involving intersediate frequency (i.f.,) interference).	chibit No. E7
23.(a) is the proposed operation on Channel 218, 219, or 220?	Yes No
(b) If the answer to (a) is yes, does the proposed operation satisfy the requirements of 47 CF.R. Section 73.207?	Yes No
(c) if the answer to (b) is yes, attach as an Exhibit information required in 1/ regarding separation requirements with respect to stations on Channels 221, 222 and 223.	rhipir No. N/A
(d) If the answer to (b) is no, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose.	chibs No. N/A

<sup>1/</sup> A showing that the proposed operation meets the minimum distance separation requirements, include existing stations, proposed stations, and cities: which appear in the Table of Allotments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

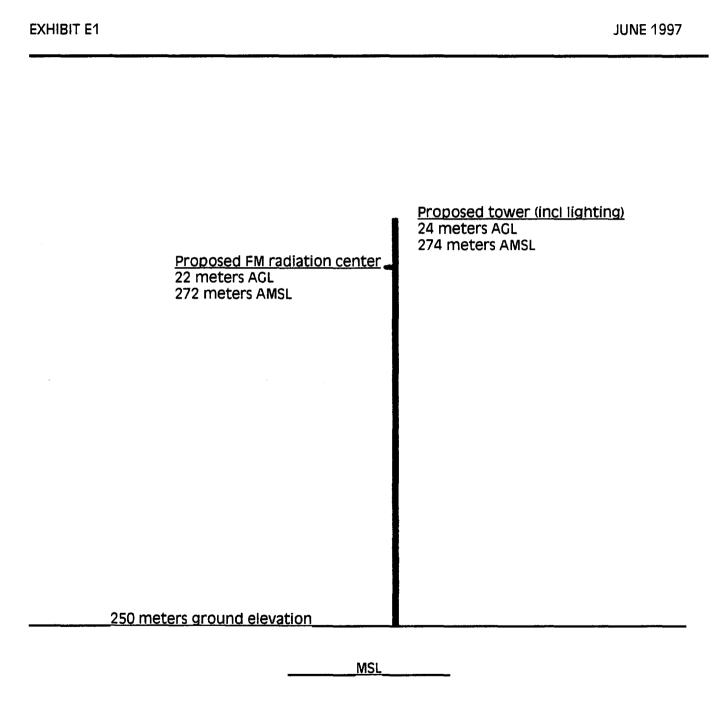
#### SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 6)

	(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a contended engineering study to establish the lack of prohibited overlap of contours involving affected statements of the engineering study must include the following:	1 1/4 1
	<ol> <li>Protected and interfering contours, in all directions (360 ), for the proposed operation.</li> <li>Protected and interfering contours, over pertinent arcs, of all short-spaced assignmapplications and allotments, including a plot showing each transmitter location, with identifying letters or file numbers, and indication of whether facility is operating or proposed. For allotments, use the reference coordinates as transmitter location.</li> <li>When necessary to show more detail, an additional allocation study utilizing a map with a scale to clearly show prohibited overlap will not occur.</li> </ol>	g call vacant
	(4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified (5) The official title(s) of the map(s) used in the exhibits(s).	
24.	I. Is the proposed station for a channel in the range from Channel 201 to 220 (88.1 through 91.9 and the proposed antenna location within the distance to an affected TV Channel 6 station(s) as do in 47 C.F.R. Section 73.525?	
	If Yes, attach as an Exhibit either a TV Channel 6 agreement letter dated and signed by both partial map and an engineering statement with calculations demonstrating compliance with 47 C.F.R. Station.	l ⊏o l
25.	5. Is the proposed station for a channel in the range from Channel 221 to 300 (92.1-107.9 MHz)?	Yes No
	If Yes, attach as an Exhibit information required in 1/. (Except for Class B (secondary) proposals.)	Exhibit No.
26.	5. Environmental Statement (See 47 C.F.R. Section 1.1307 et seq.)	
	Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, suc it may have a significant environmental impact?	th that Yes No
	If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311	Exhibit No.
	If No, explain briefly why not. See Exhibit E9	

#### CERTFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed)	Relationship to Applicant le.g., Consolting Engineer!
Linda Adams	Technical Consultant
Signature	Address linelede 219 tedel
souther to	P.O. Box 214044 Sacramento, CA 95821
Date 6-17-97	Telephone No. (Include Area Code)  ( 916 ) 568-7292



NOT TO SCALE

EXHIBIT E2
Page 1

JUNE 1997

#### Horizontal Plane Pattern (vertical polarization only)

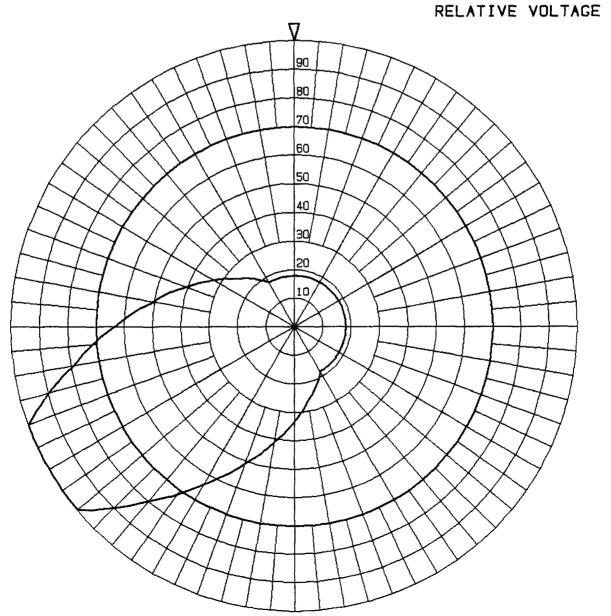


EXHIBIT E2 Page 2 **JUNE 1997** 

#### Tabulation of Horizontal Plane Pattern (vertical polarization only)

ERP = .93 Radial	kW,315 HAAT	dBk Fi kW	M - 2-6 T dBk	Tables Field	60 dBu.5
0 Degs. 10 Degs.	-88.5M -124.2M	0.030 0.030	-15.229 -15.229	0.180 0.180	4.1 4.1
20 Degs.	-154.9M	0.030	-15.229	0.180	4.1
	-184.3M	0.030	-15.229	0.180	4.1
40 Degs.	-185.1M	0.030	-15.229	0.180	4.1
50 Degs.	-198.2M	0.030	-15.229	0.180	4.1
60 Degs.	-174.2M	0.030	-15.229	0.180	4.1
70 Degs.	-116.6M	0.030	-15.229	0.180	4.1
80 Degs.	-46.6M	0.030	-15.229	0.180	4.1
90 Degs.	-26.5M	0.030	-15.229	0.180	4.1
100 Degs.	-60.2M	0.030	-15.229	0.180	4.1
	-114.0M	0.030	-15.229	0.180	4.1
120 Degs.	-72.5M	0.030	-15.229	0.180	4.1
130 Degs.	-24.6M	0.030	-15.229	0.180	4.1
140 Degs.	8.0M	0.030	-15.229	0.180	4.1
150 Degs.	65.2M	0.030	-15.229	0.180	6.1
160 Degs.	108.8M	0.045	-13.468	0.220	8.8
170 Degs. 180 Degs.	132.7M 136.6M	0.065 0.100	-11.871 -10.000	0.264 0.328	10.6 12.0
190 Degs.	137.0M	0.100	-8.097	0.328	13.3
200 Degs.	133.5M	0.240	-6.198	0.508	14.7
210 Degs.	121.8M	0.375	-4.260	0.635	15.8
220 Degs.	80.6M	0.590	-2.291	0.796	14.3
230 Degs.	38.1M	0.930	-0.315	1.000	11.1
240 Degs.	51.2M	0.930	-0.315	1.000	12.9
250 Degs.	35.9M	0.930	-0.315	1.000	10.8
260 Degs.	69.7M	0.590	-2.291	0.796	13.3
270 Degs.	119.0M	0.375	-4.260	0.635	15.6
280 Degs.	145.4M	0.240	-6.198	0.508	15.4
290 Degs.	143.8M	0.155	-8.097	0.408	13.7
300 Degs.	132.1M	0.100	-10.000	0.328	11.8
310 Degs.	100.8M	0.065	-11.871	0.264	9.3
320 Degs.	63.4M	0.045	-13.468	0.220	6.7
330 Degs.	28.7M	0.030	-15.229	0.180	4.1
340 Degs. 350 Degs.	-24.3M -70.5M	0.030 0.030	-15.229 -15.229	0.180 0.180	$\frac{4.1}{4.1}$
or pegs.	-/U.JM		-15.229	J. 10U	4.1

EXHIBIT E3 JUNE 1997

The proposed FM will be located at a site that is not currently utilized by other broadcast facilities. It is not anticipated that there will be any interference caused to other facilities by the proposed FM, however, the applicant will assume full responsibility for the elimination of any interference caused by the proposed FM to facilities as referenced in No. 12 of Section V-B.

EXHIBIT E4 JUNE 1997

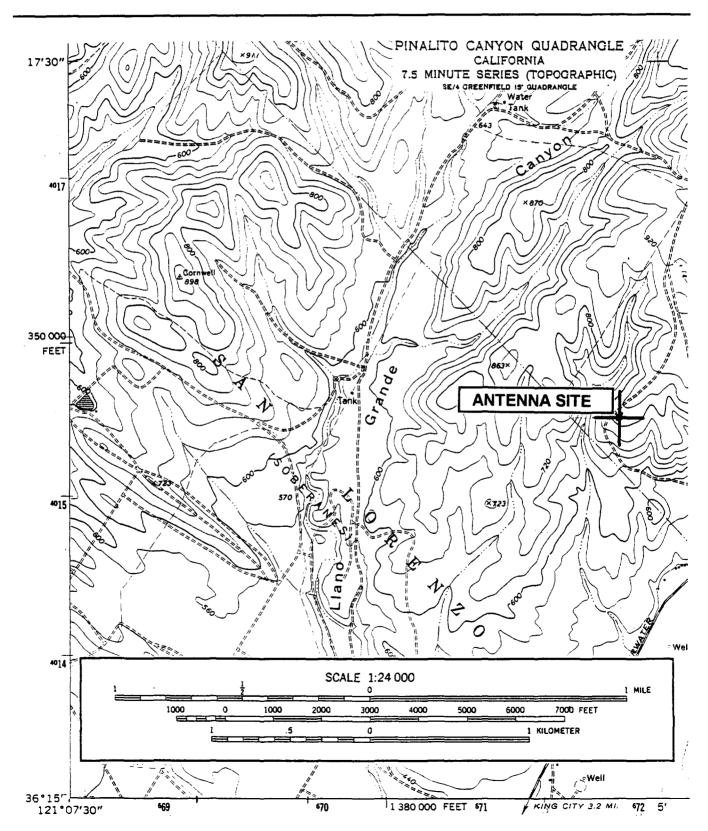


EXHIBIT E5 JUNE 1997

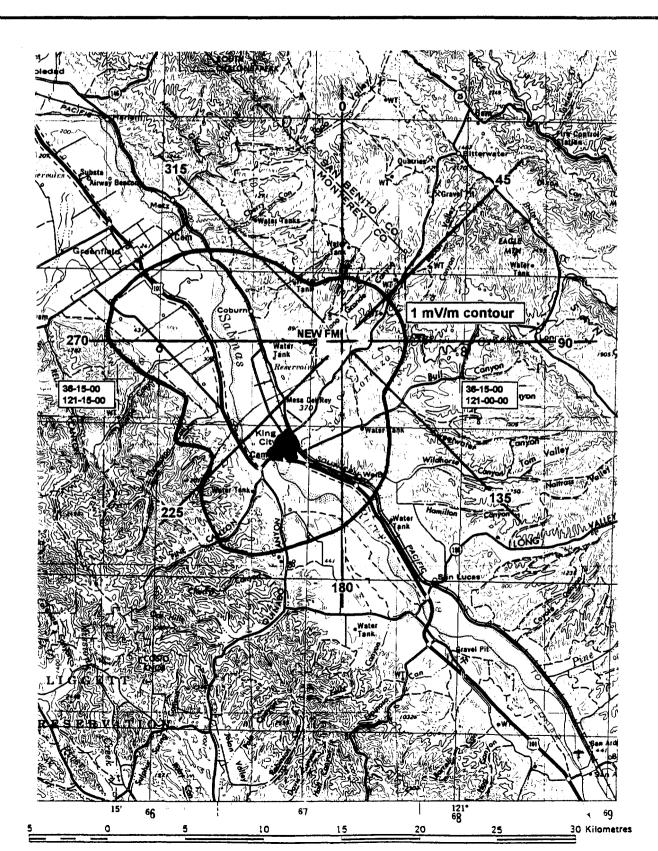


EXHIBIT E6 JUNE 1997

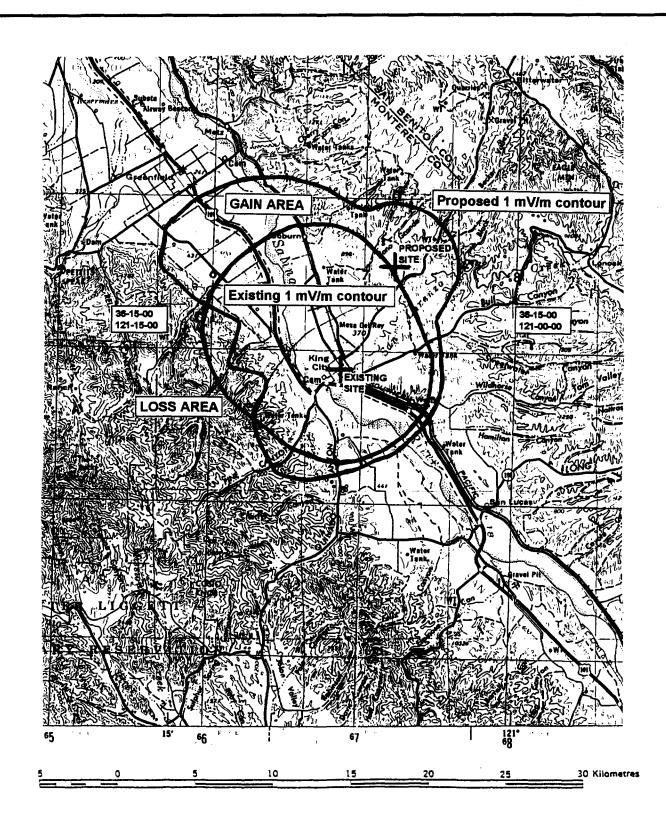


EXHIBIT E7 Page 1 **JUNE 1997** 

The proposed FM meets all minimum separation distance requirements with regard to other stations that are co-channel, first, second and third adjacent channels, including those separated by 53/54 channels, with the exception that the proposed FM is mutually exclusive with the new application of Pataphysical Broadcasting for channel 219B, San Ardo, CA, BPED-940316MB.

Currently the application of Central Coast for channel 217 specifies a site that is within the 60 dBu contour of Pataphysical's application for channel 219, resulting in Central Coast's 80 dBu contour being completely encompassed by Pataphysical's 60 dBu contour. By a mutual agreement between Central Coast and Pataphysical, Central Coast is proposing to re-locate to a site that is still within the 60 dBu contour of Pataphysical, however, due to the remoteness of the new site, the population within Central Coast's proposed 80 dBu contour has been greatly reduced. The current 80 dBu contour is within the city limits of King City and covers an area of 17.91 sq. km that contains 7,634 persons, which is the entire 1990 census population for King City. The proposed 80 dBu contour is located 8.0 km from the center of King City and covers an area of 45.63 sq. km. Determined from an actual count, there are only 11 houses within the proposed 80 dbu contour. Even though the proposed 80 dbu contour covers a larger area than the current 80 dBu contour, there will be much less potential for interference to Pataphysical's 60 dBu contour as the site is located in a rural area of farms and ranchland that is unlikely to be developed in the future.

The remaining pages of this Exhibit contain an interference study showing the relationship of the proposed FM to other stations, detailed information on the relationship between the proposed FM and Pataphysical's application, and detailed information showing the lack of prohibited overlap between the proposed FM and KHDC, channel 215A, Chualar, CA.

EXHIBIT E7 Page 2 **JUNE 1997** 

#### CH# 217A - 91.3 MHz

# INTERFERENCE CHECKS WITH NEW, KING CITY, CA at N. LAT. 36 16 18 W. LNG. 121 05 11 PWR = .93 kM H.A.A.T. = 11 M C.O.R. = 272 M AMSL

Protected F(50-50) 60 dBu = 9.98 km

F(50-10) 40 dBu = 34.78 54 dBu = 13.91 80 dBu = 3.09 100 dBu = 2.14

CH# CALL	TYPE * IN * * OUT *	BEARING DISTANCE	LAT.	PWR(kW) INT(km) PRO(km)					
CITY	STATE LICENSEE	<b>&lt;</b>	LNG.	HAAT (M) COR (M) FILE #					
214A AP214	AP DCN 58.0 57.4	336.8 70.58 km.	36 51 20	1.40 2.62 11.03					
Hollister	CA Central Coast Educational	156.8 43.86 Mi	121 23 57	-113.0 106 BPED951108MO					
215A KHDC	LI CN 31.1 25.0	317.3 46.95 km	36 34 54	3.00 5.87 18.83					
Chualar	CA Voces Unidas Bilingual Bro	137.3 29.17 Mi	121 26 34	59.0 369 BLED810708AC					
216B1 KLVY.C	CP CN 72.2 86.6	36.7 131.46 km	37 13 01	15.00 49.27 30.99					
Pairmead	CA Educational Media Foundati	216.7 81.69 Mi	120 11 57	78.0 183 BPED940606ME					
217A KCPR	LI CN 58.7 67.3	160.9 114.13 km	35 17 58	2.00 45.40 12.00					
San Luis Obispo	CA California State Polytechn	340.9 70.92 Mi	120 40 26	-107.0 158 BLED1467					
217A AP217	AP DVN -36.7 -37.0	209.3 7.64 km	36 12 42	0.90 34.39 9.90					
King City	CA Central Coast Educational	29.3 4.75 Mi	121 07 41	0.0 127 BPED940606MB					
FCC Comment > Amend	ied 950821-Designated for Hearing	D97-79 970224							
217B KUOP	LI DCN 1.5 50.0	350.2 136.14 km	37 28 48	7.00 124.64 51.34					
Stockton	CA University of the Pacific	170.2 84.59 Mi	121 21 02	372.0 827 BLED830310AI					
	·								
218B1 KKUP	LI CN 50.9 65.6	324.4 115.13 km	37 06 40	0.20 54.28 35.62					
Cupertino	CA Assurance Science Foundati	144.4 71.54 Mi	121 50 36	787.0 1180 BLED#31114AD					
219B AP219	AP VN 8.4 -18.5	167.8 36.33 km	35 57 06	2,70 17.94 51.78					
San Ardo	CA Pataphysical Broadcasting	347.8 22.57 Mi	121 00 03	543.0 889 BPED940316MB					
FCC Comment > Verti	ical Polarization Only-Designated	for Hearing D97-79	970224						
		•							
220A KSPB	LI CN 70.9 58.1	295.3 82.71 km	36 35 11	1.00 1.78 22.45					
Pebble Beach	CA Robert Louis Stevenson Sch	115.3 51.39 Mi	121 55 21	148.0 245 BMLED881216KF					
I.F. RELATIONSHIPS	:								
271B KRKCFM	LI CN 15.0 R 21.3 M	167.8 36.33 km	35 57 06	2.60 3.29 66.00					
King City	CA King City Communications C	347.8 22.57 Mi	121 00 03	555.0 899 BLH890203KC					
· -	2								
Nearest CH 6 Grade	B =KSBY at-15.63 km, Distance=	108.39 Azimuth =	158.9 Deq.	T.					
				···					

EXHIBIT E7 Page 3

**JUNE 1997** 

new

Channel= 217 Max ERP = .93 kW RCAMSL = 272 M N. Lat = 361618 W. Lng = 1210511

Protected 60 dBu

AP219 - BPED940316MB

Channel = 219 Max ERP = 2.7 kW

RCAMSL = 889 M N. Lat = 355706

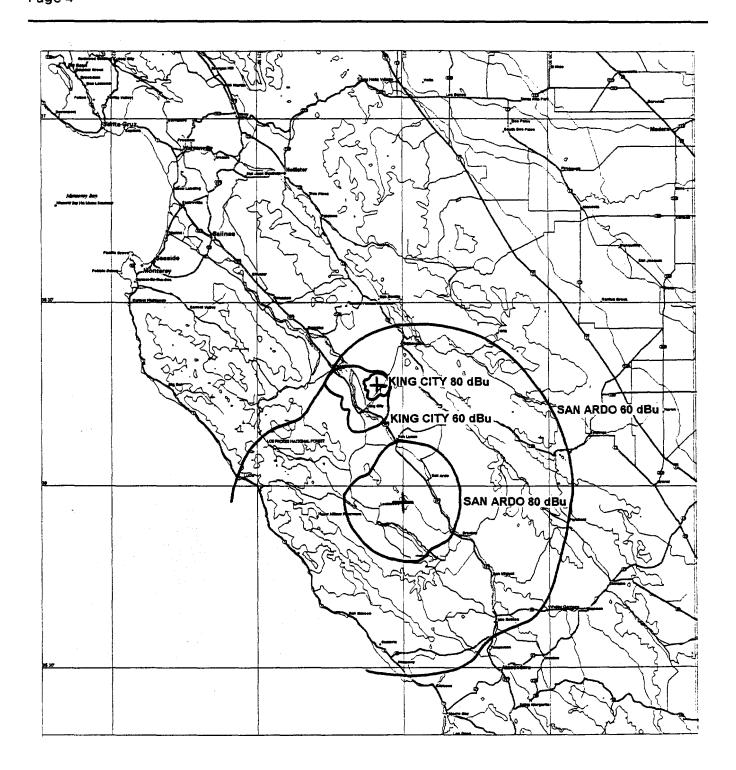
W. Lng = 1210003

Interfering 80 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
0.0	0.030	-88.5	4.1	349.0	2.700	552.3	40.4	67.3
10.0	0.030	-124.2	4.1	350.0	2.700	560.9	40.2	67.5
20.0	0.030	-154.9	4.1	350.9	2.700	567.3	39.9	67.8
30.0	0.030	-184.3	4.1	351.8	2.700	572.3	39.5	68.0
40.0	0.030	-185.1	4.1	352.6	2.700	576.5	39.0	68.3
50.0	0.030	-198.2	4.1	353.2	2.700	579.9	38.4	68.6
60.0	0.030	-174.2	4.1	353.7	2.700	582.9	37.8	68.9
70.0	0.030	-116.6	4.1	354.1	2.700	585.2	37.1	69.3
80.0	0.030	-46.6	4.1	354.3	2.700	586.2	36.4	69.6
90.0	0.030	-26.5	4.1	354.3	2.700	586.2	35.7 35.0	69.9 70.2
100.0 110.0	0.030	-60.2 -114.0	4.1	354.0 353.6	2.700 2.700	584.6 582.3	34.3	70.2
120.0	0.030	-72.5	4.1	353.6		502.3 578.7	34.3	70.4
130.0	0.030 0.030	-72.5 -24.6	4.1 4.1	353.0	2.700 2.700	573.9	33.7	70.7
140.0	0.030	8.0		352.1	2.700	568.5	33.2	70.8
150.0	0.030	65.2	4.1	351.1	2.700	569.6	30.5	70.9
160.0	0.030	108.8	6.1 8.8	351.3	2.700	562.5	27.6	72.0
170.0	0.045	132.7	10.6	346.8	2.700	535.0	25.7	74.2
180.0	0.100	136.6	12.0	341.9	2.700	510.8	24.8	74.4
190.0	0.155	137.0	13.3	335.9	2.700	466.5	24.5	73.9
200.0	0.133	137.0	14.7	329.6	2.700	392.8	25.2	71.8
210.0	0.375	121.8	15.8	324.4	2.700	371.3	26.8	70.1
220.0	0.590	80.6	14.3	325.5	2.700	364.9	29.8	68.1
230.0	0.930	38.1	11.1	330.2	2.700	398.3	32.7	67.5
240.0	0.930	51.2	12.9	327.0	2.700	369.8	34.7	65.8
250.0	0.930	35.9	10.8	330.7	2.700	402.8	36.5	65.9
260.0	0.590	69.7	13.3	327.9	2.700	377.4	39.2	64.0
270.0	0.375	119.0	15.6	326.7	2.700	367.8	42.5	62.3
280.0	0.240	145.4	15.4	329.1	2.700	388.3	44.5	62.0
290.0	0.155	143.8	13.7	332.9	2.700	424.0	45.1	62.6
300.0	0.100	132.1	11.8	336.6	2.700	474.8	45.1	63.8
310.0	0.065	100.8	9.3	340.3	2.700	500.6	44.1	64.8
320.0	0.045	63.4	6.7	343.5	2.700	518.8	42.4	65.8
330.0	0.030	28.7	4.1	346.0	2.700	530.0	40.3	66.9
340.0	0.030	-24.3	4.1	347.0	2.700	536.3	40.4	67.0
350.0	0.030	-70.5	4.1	348.0	2.700	544.0	40.5	67.1

EXHIBIT E7
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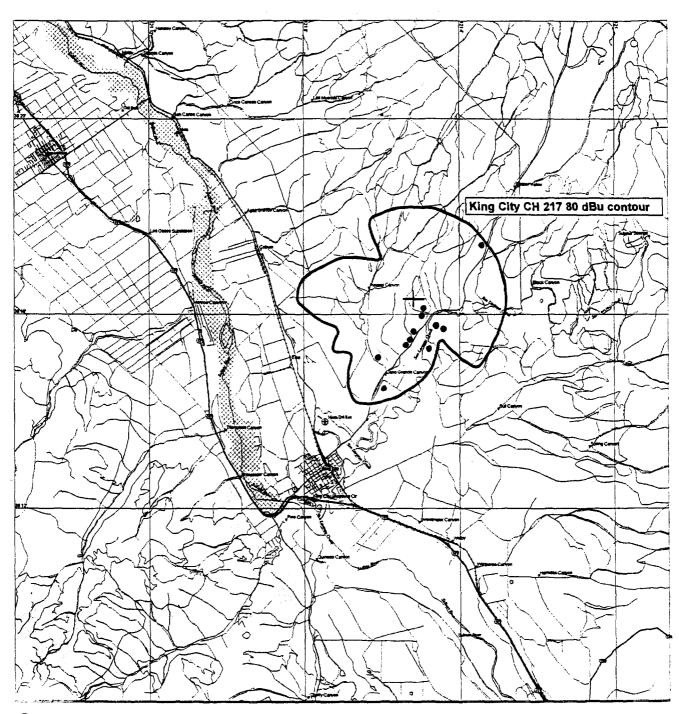


20	Miles		

EXHIBIT E7
Page 5

JUNE 1997

EXHIBIT E7 Page 6 **JUNE 1997** 



location of houses

2 Miles

EXHIBIT E7 Page 7

**JUNE 1997** 

new

Channel= 217
Max ERP = .93 kW
RCAMSL = 272 M
N. Lat = 361618
W. Lng = 1210511

Protected 60 dBu

KHDC - BLED810708AC

Channel = 215 Max ERP = 3 kW RCAMSL = 369 M N. Lat = 363454 W. Lng = 1212634

Interfering 80 dBu

Azimuth (degrees)	ERP (kW)	TAAH (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
0.0	0.030	-88.5	4.1	133.4	3.000	119.8	44.0	52.3
10.0	0.030	-124.2	4.1	132.9	3.000	111.5	44.6	51.5
20.0	0.030	-154.9	4.1	132.4	3.000	103.6	45.2	50.7
30.0	0.030	-184.3	4.1	132.2	3.000	100.6	45.9	50.2
40.0	0.030	-185.1	4.1	132.1	3.000	99.1	46.6	49.8
50.0	0.030	-198.2	4.1	132.1	3.000	99.1	47.3	49.5
60.0	0.030	-174.2	4.1	132.3	3.000	102.1	48.0	49.5
70.0	0.030	-116.6	4.1	132.6	3.000	106.7	48.7	49.6
80.0	0.030	-46.6	4.1	133.1	3.000	114.8	49.3	49.9
90.0	0.030	-26.5	4.1	133.6	3.000	123.2	49.9	50.1
100.0	0.030	-60.2	4.1	134.3	3.000	135.1	50.3	50.6
110.0	0.030	-114.0	4.1	135.0	3.000	146.9	50.7	51.1
-120.0	0.030	-72.5	4.1	135.7	3.000	157.8	50.9	51.5
130.0	0.030	-24.6	4.1	136.5	3.000	168.9	51.1	52.0
140.0	0.030	8.0	4.1	137.3	3.000	178.5	51.1	52.5
150.0	0.030	65.2	6.1	138.6	3.000	192.0	53.0	52.4
160.0	0.045	108.8	8.8	140.7	3.000	211.2	55.2	52.4
170.0	0.065	132.7	10.6	143.0	3.000	227.0	56.2	52.6
180.0	0.100	136.6	12.0	145.4	3.000	238.8	56.3	53.0
190.0	0.155	137.0	13.3	148.0	3.000	250.2	56.0	53.6
200.0	0.240	133.5	14.7	150.8	3.000	260.6	55.2	54.2
210.0	0.375	121.8	15.8	153.4	3.000	269.2	53.8	55.1
220.0	0.590	80.6	14.3	153.3	3.000	268.9	50.8	56.3
230.0	0.930	38.1	11.1	150.6	3.000	259.9	47.7	57.3
240.0	0.930	51.2	12.9	153.0	3.000	267.9	45.8	58.3
250.0	0.930	35.9	10.8	150.2	3.000	258.6	43.9	58.8
260.0	0.590	69.7	13.3	152.8	3.000	267.2	41.3	60.2
270.0	0.375	119.0	15.6	154.6	3.000	273.1	38.1	61.9
280.0	0.240	145.4	15.4	152.1	3.000	264.8	35.9	62.6
290.0	0.155	143.8	13.7	147.3	3.000	247.2	35.3	62.3
300.0	0.100	132.1	11.8	142.6	3.000	224.7	35.9	61.2
310.0	0.065	100.8	9.3	138.9	3.000	195.0	37.7	59.0
320.0	0.045	63.4	6.7	136.6	3.000	170.2	40.3	56.6
330.0	0.030	28.7	4.1	135.9	3.000	160.8	42.9	54.9
340.0	0.030	-24.3	4.1	135.0	3.000	146.9	43.2	54.1
350.0	0.030	-70.5	4.1	134.2	3.000	133.4	43.5	53.2

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**JUNE 1997** 

KHDC - BLED810708AC Channel= 215

Channel = 215 Max ERP = 3 kW RCAMSL = 369 M N. Lat = 363454 W. Lng = 1212634

Dwatasta

new

Channel = 217 Max ERP = .93 kW RCAMSL = 272 M N. Lat = 361618 W. Lng = 1210511

Protected 60 dBu

Interfering 80 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	TAAH (m)	Dist (km)	Actual (dBu)
0.0 10.0 20.0	3.000 3.000 3.000	-119.0 -216.1 -257.2	13.2 13.2 13.2	326.2 328.0	0.035	45.4 37.8	57.3 55.9 54.3	21.9 20.9 19.9
30.0	3.000	-257.2	13.2	329.7 331.1	0.030 0.030	30.6 20.6	54.3 52.4	20.2
40.0 50.0	3.000 3.000	-222.1 -160.5	13.2 13.2	332.2 333.0	0.030 0.030	11.8 5.9	50.3 48.1	20.6 21.1
60.0	3.000	-204.9	13.2	333.4	0.030	3.2	45.8	21.6
70.0 80.0	3.000 3.000	-322.3 -313.4	13.2 13.2	333.4 332.7	0.030 0.030	3.2 8.0	43.5 41.3	22.3 22.9
90.0	3.000	-269.2	13.2	331.4	0.030	18.3	39.2	23.6
100.0 110.0	3.000 3.000	-189.7 -155.0	13.2 13.2	329.5 326.8	0.031 0.034	31.7 42.3	37.3 35.7	24.7 27.9
120.0 130.0	3.000 3.000	-21.6 71.9	13.2 20.6	323.6 322.6	0.039 0.041	59.0 62.2	34.5 26.6	31.7 36.4
140.0	3.000	205.2	33.6	309.8	0.066	101.6	13.5	53.5
150.0 160.0	3.000 3.000	257.9 289.1	37.3 39.2	278.9 262.7	0.253 0.527	145.4 84.1	13.5 18.8	62.4 56.0
170.0 180.0	3.000 3.000	303.8 301.5	40.0 39.9	258.8 260.3	0.627 0.583	69.2 70.1	25.6 32.5	49.8 45.6
190.0	3.000	276.0	38.4	265.0	0.476	96.0	38.8	44.7
200.0 210.0	3.000 3.000	221.4 136.0	34.9 27.7	272.1 282.8	0.344 0.214	131.3 145.2	44.0 47.0	43.5 41.0
220.0	3.000	89.8	23.0	289.7	0.157	143.9	49.7	38.5
230.0 240.0	3.000 3.000	118.8 118.9	26.2 26.2	288.7 291.3	0.165 0.147	144.2 143.2	54.9 58.7	36.7 34.7
250.0 260.0	3.000 3.000	128.2 241.0	27.0 36.3	293.7 292.6	0.133 0.140	141.0 142.2	62.6 73.3	32.8 29.6
270.0	3.000	303.7	40.0	295.6	0.123	138.3	79.7	26.9
280.0 290.0	3.000 3.000	307.2 304.9	40.2 40.0	300.1	0.100 0.083	132.0 122.5	82.6 84.6	24.8 23.0
300.0 310.0	3.000	298.1	39.7 39.1	309.3 313.9	0.067	103.6 83.1	85.6 85.9	20.9 19.2
320.0	3.000	288.9 230.7	35.6	318.4	0.057 0.048	64.2	82.5	18.4
330.0 340.0	3.000 3.000	144.3 6.0	28.4 13.2	322.0 322.1	0.042 0.042	63.1 63.0	74.9 59.3	19.6 23.8
350.0	3.000	-107.1	13.2	324.2	0.038	56.3	58.5	23.1